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October 18, 2012

**VIA ECFS**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street  
Washington, D.C. 20554

Re: *Telecommunications Carriers Eligible for Universal Service Support*, WC Docket No. 09-197;  
*Lifeline and Link Up Reform and Modernization*, WC Docket No. 11-42

Dear Ms. Dortch:

On Wednesday, October 17, 2012, Kasey Chow, on behalf of Flatel Wireless, Inc. dba Zing PCS ("Flatel Wireless" or the "Company"), as well as Adriana Solar, President of the Company, and Abby Matari, CEO of the Company, spoke with Kimberly Scardino, Divya Shenoy, and Michelle Schaefer of the Telecommunications Access Policy Division. We discussed Flatel Wireless' Compliance Plan as filed on October 4, 2012.

Abby Matari gave an introduction and overview of the Company, including detail regarding the Company's affiliate Flatel, Inc. and the Company's d/b/a Zing PCS, as well as current operations, and number of wireless and wireline customers in various states. Mr. Matari confirmed the Company's commitment and ongoing efforts to re-certify its active Lifeline customer base. Mr. Matari also discussed the Company's enrollment processes.

We discussed requested changes to the Company's certification form and websites. Finally, Flatel Wireless agreed to file a revised Compliance Plan with all suggested changes and additions. Attached is a copy of the presentation deck that was provided at the meeting yesterday.

Please contact me if you have any questions. Thank you.

Respectfully submitted,

/s/ KASEY CHOW

Kasey Chow  
Associate at Lance J.M. Steinhart, P.C.  
Attorneys for Flatel Wireless, Inc. dba Zing PCS

Attachment

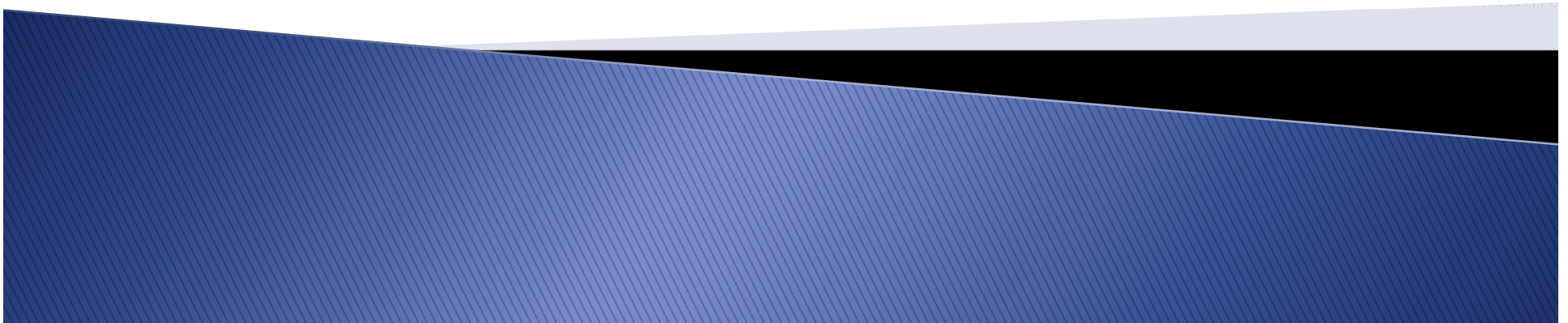
cc: Adriana Solar  
Kimberly Scardino  
Divya Shenoy  
Michelle Schaefer



# FLATEL WIRELESS, INC.

Federal Communications Commission

October 17, 2012



# Agenda

- ▶ Introduction to FLATEL Wireless
- ▶ Financial & Technical Capability
- ▶ FLATEL Wireless' Lifeline Plans
- ▶ Marketing Plan
- ▶ Enrolling Lifeline Customers
- ▶ Recertifying Lifeline Customers
- ▶ Preventing Waste, Fraud & Abuse
- ▶ Q & A

# FLATEL Wireless

- ▶ Introduction to the Company
  - FLATEL Wireless, Inc. incorporated in Florida on July 7, 2011
  - Will operate its Lifeline wireless business as FLATEL Wireless
  - Operates its retail wireless business as Zing PCS
  - Current operations: retail wireless in Florida
  
- ▶ Names and Identifiers used by the Company
  - FLATEL Wireless
  - Flatel Wireless
  - Zing PCS



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Wireless

# Financial Capability

- ▶ FLATEL Wireless has the financial capability to provide the supported Lifeline service:
  - Current Operations – Retail Wireless
  - Affiliate
  - FLATEL Wireless plans to serve both Lifeline and non-Lifeline customers in each state it seeks ETC designation



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# Technical Capability

- ▶ FLATEL Wireless has the technical capability to provide the supported Lifeline service :
  - Key Management Experience
    - Adriana Solar – 20+ yrs in telecom industry
    - Abby Matari – 19+ yrs in telecom industry



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# Lifeline Plan

- ▶ FLATEL Wireless proposes the following Lifeline plan:
  - Lifeline Plan 250
- ▶ Plan includes:
  - Free handset
  - Free calls to 911 Emergency Services
  - Free calls to Customer Service
  - Free Voicemail, Caller ID, and Call Waiting
  - Free Domestic Long Distance

# Lifeline Plan

- ▶ Lifeline Plan 250
  - Lifeline Net Cost: FREE
  - 250 anytime minutes (voice or text)
  - 1 text = 1 minute
  - No Rollover



# Marketing Plan

- ▶ All materials will comply with disclosure requirements:
  - Disclose company name under which it does business;
  - Explain in clear, easily understood language the following:
    - ✓ Only eligible consumer may enroll in the program;
    - ✓ What documentation is necessary for enrollment;
    - ✓ The program is limited to one benefit per household, consisting of either wireline or wireless service;
    - ✓ Lifeline is a government benefit program; and
    - ✓ Consumers who willfully make false statements in order to obtain the benefit can be punished by fine or imprisonment or can be barred from the program.

# Enrolling Lifeline

- ▶ Eligibility Confirmation:

1. Confirm prospect's identity (see government issued picture ID)
2. Confirm program or income eligibility (see proof)
3. Confirm valid household address and whether permanent/temporary or multi-household (validate w/USPS)
4. Confirm prospect not currently receiving subsidy (ask prospect, perform duplicate check into an internal and pooled external database)
5. Confirm that eligible party has received the handset and has used it prior to seeking reimbursement

# Enrolling Lifeline

- ▶ End-User Education and Disclosures:
  - Lifeline is a federal non-transferable benefit
  - Lifeline service is available for only one line per household
  - A household is defined, for Lifeline Program purposes, as any individual or group of individuals who live together at the same address and share income and expenses
  - Households are NOT permitted to receive benefits from multiple providers
  - Violation of the one per household limitation constitutes violation of the FCC's rules and will result in de-enrollment from the program, and potentially prosecution by the U.S. Government

# Recertifying Lifeline

- ▶ Annual Recertification Compliance:
  - FLATEL Wireless commits to re-certify the eligibility of all Lifeline customers and report the results to USAC.
  - After 2012, FLATEL Wireless will continue to re-certify all active Lifeline customers by the annual anniversary of their enrollment.
  - All customers who fail to respond to the annual certification request within 30 days will be given additional notice that they have 30 more days to respond. If there is still no response, they will be de-enrolled from the Lifeline program.
  - In addition, FLATEL Wireless will continue to follow any state-specific requirements.

# Preventing Waste, Fraud & Abuse

- ▶ Measures to prevent waste, fraud & abuse:
  - Duplicates Database
    - Pooled External Database (CGM, LLC)
    - National Database, when in place
  - Provide customer data to PUCs, FCC, and USAC
  - Independent Biennial Audits\*
    - \*if FLATEL Wireless draws \$5 million+ on an annual basis

# QUESTIONS?

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